IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Shenzhen Dejiayun Network)
Technology Co., Ltd., a Chinese)
Corporation	
) Case No. 21-cv-6607
Plaintiff,)
) Judge Manish S. Shah
V.)
) Magistrate Jeffrey I. Cummings
The Partnerships And)
Unincorporated Associations)
Identified On Schedule "A")
)
Defendants.)
)

PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO <u>DEFENDANT TONIGHTHERE'S MOTION TO VACATE DEFAULT JUDGMENT</u>

Plaintiff Shenzhen Dejiayun Network Technology Co., Ltd., ("Deijayun" or "Plaintiff") by and through its counsel, Ford Banister IP, moves this Honorable Court for an extension of time of fourteen days from November 29, 2022 to respond to Defendant Tonighthere's Motion to Vacate Default Judgment. In support of its request, Plaintiff states as follows:

- 1. On November 14, 2022, Defendant Tonighthere (hereinafter, "Defendant") submitted its Motion to Vacate Default Judgment. [Doc. 102]
- 2. On November 15, 2022, the Court set a briefing schedule on the Motion, requiring Plaintiff to respond by November 29, 2022 with Defendant to reply by December 6, 2022. [Doc. 104]
- 3. Following entry of the briefing schedule, counsel for Plaintiff and Defendant have corresponded regarding the need for Plaintiff to conduct jurisdictional discovery. As of time of

filing, the parties have not set a time to confer but have exchanged proposed dates and times for

conference on the matter.

4. In order to permit the parties time to confer, Plaintiff moves unopposed to extend

the deadline for submission of its response by fourteen days from November 29, 2022 to

December 13, 2022 with Defendant to reply by December 27, 2022.

5. Defendant does not oppose the instant motion for extension of time.

6. No party will be prejudiced by grant of the instant motion for extension of time.

7. The instant motion is not brought for purposes of delay or harassment.

8. Grant of the instant request for extension of time is in the interest of judicial

efficiency as Plaintiff hopes to avoid motion practice on the need for jurisdictional discovery

with such negotiation perhaps leading to the resolution of Defendant's motion.

Prayer for Relief

Wherefore, Plaintiff respectfully requests that the Court grant the following relief:

a) That Plaintiff be permitted fourteen days from the current deadline of November

29, 2022 to December 13, 2022 to submit any discovery related motions;

b) That Defendant be required to reply to Plaintiff's Opposition by December 27,

2022, and

c) Any further and additional relief that the Court deems necessary and appropriate.

Respectfully submitted this 28th day of November, 2022,

/s/ L. Ford Banister, II

Bar No. 5446539

Ford Banister IP

305 Broadway - Floor 7

New York, NY 10007

Telephone: +1 212-500-3268

Email: ford@fordbanister.com

Linaii. Iora (6) Tora ourister.e

Attorney for Plaintiff

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